

## UNITED STATES DISTRICT COURT

for the  
Southern District of Ohio

## In the Matter of the Search of

(Briefly describe the property to be searched or identify the person by name and address)

A black 2015 Chevrolet Impala sedan bearing Ohio license plate JFL3659  
VIN: 2G1165538F9147472. The vehicle is currently located at 2700  
Impound Lot Rd., Columbus, Ohio 43207.

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Case No. 2:21-mj-351

## APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A

located in the Southern District of Ohio, there is now concealed (identify the person or describe the property to be seized):

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

evidence of a crime;  
 contraband, fruits of crime, or other items illegally possessed;  
 property designed for use, intended for use, or used in committing a crime;  
 a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

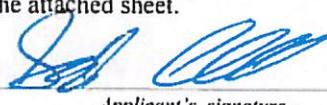
Code Section

Offense Description

The application is based on these facts:

See attached Affidavit.

Continued on the attached sheet.  
 Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

Samuel Chappell ATF TFO

Printed name and title

Sworn to before me and signed in my presence.

Date:

5-19-21



Judge's signature

City and state: Columbus, Ohio

Chelsey M Vascura, U.S. Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT  
FOR SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

IN THE MATTER OF THE SEARCH OF:  
A black 2015 Chevrolet Impala sedan  
bearing Ohio license plate JFL3659 VIN:  
2G1165538F9147472

Case No. \_\_\_\_\_

**AFFIDAVIT IN SUPPORT OF AN**  
**APPLICATION FOR A WARRANT TO**  
**SEARCH AND SEIZE**

I, Samuel Chappell being first duly sworn, hereby depose and state as follows:

I.

**INTRODUCTION**

1. I make this affidavit in support of an application under Rule 41 of the Federal Rules of Criminal Procedure for a warrant to search a black 2015 Chevrolet Impala sedan bearing Ohio license plate JFL3659 with VIN: 2G1165538F9147472 hereinafter referred to as the "VEHICLE," further described in Attachment A, for the things described in Attachment B.

2. I am a Columbus Ohio Police Office (Columbus Police Department) currently assigned as a Task Force Officer (TFO) with the bureau of Alcohol Tobacco and Firearms (ATF). The Columbus Division of Police has employed me since 2007. My responsibilities as a Task Force Officer include the investigation of violent criminal street gangs, narcotics traffickers, money launders, and firearm related crimes. I have participated in the execution of search warrants and arrests related to the above-referenced offenses. Throughout this affidavit, reference to "investigators" specifically refers to criminal investigators.

3. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

4. Based on our ongoing investigation, your affiant believes probable cause exists to find that Larry ROWE, and others, are engaged in a large-scale conspiracy involving fraud, narcotics distribution, and money laundering. Your affiant further believes that evidence and instrumentalities of this activity can be found in the a black 2015 Chevrolet Impala sedan bearing Ohio license plate JFL3659 with VIN: 2G1165538F9147472.

II.

**PURPOSE OF AFFIDAVIT**

5. This affidavit is submitted for the limited purpose of establishing probable cause in support of an application of a warrant to search the property located at 1908 Solera Drive Columbus, Ohio 43229 and therefore contains only a summary of the relevant facts. I have not included each and every fact that I, or others, have learned during the course of this investigation. The information set forth in this affidavit is based on my own participation in the investigation, information I have received from other law enforcement officials and from my other agents' analysis of documents and records relating to this investigation. As one of the case agents on this investigation, I am familiar with the investigative efforts of other agents/Columbus Police Detectives who have worked on this investigation. Further, I am familiar with the

evidence gathered through the issuance of search warrants, subpoenas, and information provided to myself and other agents by cooperating individuals and informants.

6. I believe there exists sufficient probable cause that evidence of the violation of 21 U.S.C. § 841(a)(1) (possession with intent to distribute a controlled substance) exists and can be found in the VEHICLE.

III.

**APPLICABLE STATUTES AND DEFINITIONS**

7. Title 21, United States Code, Section 841 makes it a federal crime for any person to manufacture, distribute, or dispense, or possess with intent to manufacture, distribute or dispense a controlled substance. Subsection (b) of this section makes cocaine, cocaine base, heroin, N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly referred to as fentanyl, and any of their isomers controlled substances. Title 21, United States Code, Section 846, makes it a crime for any person to attempt or conspire to commit any offense defined in Section 841.

IV.

**INVESTIGATION AND PROBABLE CAUSE**

8. On or about May 19, 2021 a federal search warrant was executed on 1908 Solera Dr. Case NO 2:21-MJ-340 incorporated as Attachment C. Investigators observed the VEHICLE parked in front of the 1908 Solera Dr. Prior to the execution of the search warrant Martez JACKSON was observed entering 1908 Solera Dr.

9. During the execution of the search warrant Martez JACKSON fled from the rear of the residence. JACKSON was stopped and detained. A search of JACKSON located several hundred dollars in US Currency.

10. Inside of 1908 Solera Dr. investigators located marijuana, bullets, firearm boxes, suspected crack cocaine, firearm magazines, scales, a blender with white residue and other paraphernalia used to manufacture and package narcotics.

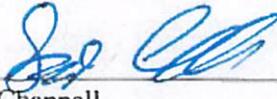
11. A Columbus Police K-9 was called to the scene. The K-9 was deployed in the parking lot. The K-9 alerted to the odor of narcotics from the VEHICLE. The VEHICLE was impounded to the Columbus Police Impound Lot. The VEHICLE is registered to Alexis GEORGE. Investigators have observed ROWE driving the VEHICLE on multiple occasions.

V.

CONCLUSION

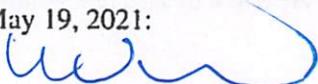
66. I submit that this affidavit supports probable cause for a warrant to search the VEHICLE described in Attachment A and seize the items described in Attachment B.

Respectfully submitted,

  
\_\_\_\_\_  
Samuel Chappell

Task Force Officer  
Alcohol, Tobacco, and Firearms

Subscribed and sworn to before me  
on May 19, 2021:

  
\_\_\_\_\_  
CHELSEY M VASCURA  
UNITED STATES MAGISTRATE JUDGE

**ATTACHMENT A**

*Property to be searched*

The vehicle to be search is a black 2015 Chevrolet Impala sedan bearing Ohio license plate JFL3659 VIN: 2G1165538F9147472. The vehicle is currently located at 2700 Impound Lot Rd., Columbus, Ohio 43207.

**ATTACHMENT B**

***Property to be seized***

1. Illicit narcotics and narcotics trafficking paraphernalia to include scales, blenders and narcotics packaging materials
2. Firearms, firearm parts, and accessories.
3. United States currency, precious metals, jewelry, and financial instruments.

**ATTACHMENT C**

## UNITED STATES DISTRICT COURT

for the  
Southern District of Ohio

In the Matter of the Search of )  
 (Briefly describe the property to be searched or identify the person by name and address) )  
 The residence located at 1908 Salera Dr., Columbus Ohio, )  
 43229, including any person located therein who may possess any form of digital device, and any digital devices located therein/thereon )

Case No.

2:21-mj-340

## SEARCH AND SEIZURE WARRANT

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search of the following person or property located in the Southern District of Ohio (identify the person or describe the property to be searched and give its location):

SEE ATTACHMENT A INCORPORATED HEREIN BY REFERENCE

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property described above, and that such search will reveal (identify the person or describe the property to be seized):

SEE ATTACHMENT B INCORPORATED HEREIN BY REFERENCE

**YOU ARE COMMANDED** to execute this warrant on or before June 1, 2021 (not to exceed 14 days)  in the daytime 6:00 a.m. to 10:00 p.m.  at any time in the day or night because good cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to Any US Magistrate Judge (United States Magistrate Judge)

Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized (check the appropriate box)

for \_\_\_\_\_ days (not to exceed 30)  until, the facts justifying, the later specific date of \_\_\_\_\_.

Date and time issued:

5-18-21 @ 3:39 pm

  
Judge's signature

City and state:

Columbus, Ohio

Chelsey M Vascura, U.S. Magistrate Judge

Printed name and title

AO 93 (Rev. 11/13) Search and Seizure Warrant (Page 2)

<b>Return</b>		
Case No.:	Date and time warrant executed:	Copy of warrant and inventory left with:
Inventory made in the presence of:		
Inventory of the property taken and name of any person(s) seized:		
<b>Certification</b>		
I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.		
Date:	<i>Executing officer's signature</i>	
<i>Printed name and title</i>		

**ATTACHMENT A**

*Property to be searched*

The property to be searched is 1908 SOLERA DRIVE COLUMBUS, OHIO 43229, further described as a multiple unit apartment complex. The outside of 1908 is painted yellow and the front door is red. The numbers 1908 are clearly marked to the right of the door. The front door opens directly into a shared parking lot.



**ATTACHMENT B**

*Property to be seized*

1. All records relating to violations of 18 U.S.C. § 1031. Major fraud against the United States 18 U.S.C. § 1956 (a)(1)(A)(I) (Laundering of monetary instruments with the intent to promote the carrying on of the specified unlawful activity) 18 U.S.C. § 1956 (a)(1)(B)(i)(Laundering of monetary instruments with the intent to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of the specified unlawful activity) and 21 U.S.C. § 841(a)(1) (possession with intent to distribute a controlled substance), those violations involving Larry ROWE, Alexis GEORGE, Rowe Foundation LLC, and Buckeye One Stop Shop LLC.
2. Illicit narcotics and narcotics trafficking paraphernalia to include scales, blenders and narcotics packaging materials
3. Firearms, firearm parts, and accessories.
4. United States currency, precious metals, jewelry, and financial instruments, as well as books and records regarding the acquisition, use and disposition of such items of value;
5. Safe deposit box lease agreements and safe deposit keys;
6. Proof of residency, including but not limited to cancelled mail, deeds, leases, rental agreements, photographs, personal telephone books, diaries, utility and telephone bills, statements, identification documents and keys.

7. Any safes, vaults, or secured storage equipment that could secret any of the above listed items, and the contents therein and the ability to use force to open them.
8. Computers or storage media used as a means to commit the violations described above.

9. For any computer or storage medium whose seizure is otherwise authorized by this warrant, and any computer or storage medium that contains or in which is stored records or information that is otherwise called for by this warrant (hereinafter, "COMPUTER"):

- a. evidence of who used, owned, or controlled the COMPUTER at the time the things described in this warrant were created, edited, or deleted, such as logs, registry entries, configuration files, saved usernames and passwords, documents, browsing history, user profiles, email, email contacts, "chat," instant messaging logs, photographs, and correspondence;
- b. evidence indicating how and when the computer was accessed or used to determine the chronological context of computer access, use, and events relating to crime under investigation and to the computer user;
- c. evidence indicating the computer user's state of mind as it relates to the crime under investigation;
- d. evidence of the attachment to the COMPUTER of other storage devices or similar containers for electronic evidence;

- e. evidence of counter-forensic programs (and associated data) that are designed to eliminate data from the COMPUTER;
- f. evidence of the times the COMPUTER was used;
- g. passwords, encryption keys, and other access devices that may be necessary to access the COMPUTER;
- h. documentation and manuals that may be necessary to access the COMPUTER or to conduct a forensic examination of the COMPUTER;
- i. records of or information about Internet Protocol addresses used by the COMPUTER;
- j. records of or information about the COMPUTER's Internet activity, including firewall logs, caches, browser history and cookies, "bookmarked" or "favorite" web pages, search terms that the user entered into any Internet search engine, and records of user-typed web addresses;
- k. contextual information necessary to understand the evidence described in this attachment.